



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 14, 2000

Robert D. Lenhard, Associate General Counsel
American Federation of State,
County & Municipal Employees
1101 17th St., N.W.
Suite 1210
Washington, D.C. 20036

RE: MUR 4762
American Federation of State,
County & Municipal Employees
American Federation of State,
County & Municipal Employees-PEOPLE
and William Lucy, as treasurer

Dear Mr. Lenhard:

This is to confirm our phone conversation yesterday, during which we discussed the circumstances surrounding the telephone bank services operated by the American Federation of State, County & Municipal Employees ("AFSCME") that were used by AFSCME-PEOPLE for telephone calls in support of three candidates for federal office in 1996, and for which AFSCME-PEOPLE reimbursed AFSCME after the calls were made. You stated that the calls were not made by members of AFSCME (on either a paid or volunteer basis), but rather by non-member employees of AFSCME who received payment by AFSCME for such services. You further stated that a portion of the in-kind contributions credited to the candidates consisted of payments to the employees, and that the remaining portion included other non-incidental costs. Finally, you indicated that the phone calls in support of the candidates were made to the general public, and that the callers expressly advocated the election of the candidate involved in the upcoming election.

As we discussed, you agreed to respond in writing, by April 27, 2000, to this Office's request for further information regarding the telephone bank services, which was included in our letter to you dated March 20, 2000. In addition to providing the information requested, please confirm in writing the facts discussed above, and provide copies of the scripts used by the callers. If any of the information requested is unavailable for the 1996 phone bank activity, please provide such information as it pertains to AFSCME's and AFSCME-PEOPLE's current practices regarding such activity in support of federal candidates, and state whether such practices were followed with respect to the 1996 activity.

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If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Thomas J. Andersen

Thomas J. Andersen
Attorney

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